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11 IN THE UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF CALIFORNIA

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14 UNITED STATES OF AMERICA,  
15 Plaintiff,  
v.  
16 AURELIA AYON GUERRERO,  
17 Defendant.

CASE NO. 2:22-CR-00178-TLN  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER  
DATE: January 9, 2025  
TIME: 9:30 a.m.  
COURT: Hon. Troy L. Nunley

18  
19 STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant Aurelia Ayon Guerrero, by and through her counsel of record, hereby stipulate as follows:

20 1. By previous order, this matter was set for status on January 9, 2025.

21 2. By this stipulation, defendant now moves to continue the status conference until February 22, 2025, at 9:30 a.m., and to exclude time between January 9, 2025, and February 20, 2025, under Local Code T4.

23 3. The parties agree and stipulate, and request that the Court find the following:

24 a) The government has represented that the discovery associated with this case includes approximately 3,398 pages of documents, including investigative reports, text messages, transcripts of recorded communications, and other materials, as well as multiple undercover video and audio recordings. All of this discovery has been produced to counsel for defendant.

1                   b)     Defendant Ayon Guerrero made her initial appearance in this district on April 20,  
2 2023, based on charges contained in a criminal complaint.

3                   c)     On May 31, 2024, Ms. White was substituted into the case as counsel of record  
4 for defendant.

5                   d)     Counsel for defendant desires additional time to review the discovery, to conduct  
6 factual investigation, to evaluate potential responses to the charges, to confer with his client, and  
7 to otherwise prepare for trial.

8                   e)     Counsel for defendant believes that failure to grant the above-requested  
9 continuance would deny him the reasonable time necessary for effective preparation, taking into  
10 account the exercise of due diligence.

11                  f)     The government does not object to the continuance.

12                  g)     Based on the above-stated findings, the ends of justice served by continuing the  
13 case as requested outweigh the interest of the public and the defendant in a trial within the  
14 original date prescribed by the Speedy Trial Act.

15                  h)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
16 et seq., within which trial must commence, the time period of January 9, 2025 to February 20,  
17 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
18 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
19 of the Court's finding that the ends of justice served by taking such action outweigh the best  
20 interest of the public and the defendant in a speedy trial.

21                  4.     Nothing in this stipulation and order shall preclude a finding that other provisions of the  
22 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
23 must commence.

24                  IT IS SO STIPULATED.

1 Dated: December 9, 2024

PHILLIP A. TALBERT  
United States Attorney

5 Dated: December 9, 2024

6 /s/ DAVID W. SPENCER  
7 DAVID W. SPENCER  
8 Assistant United States Attorney

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10 /s/ TONI WHITE  
11 TONI WHITE  
12 Counsel for Defendant  
13 AURELIA AYON GUERRERO

14 **ORDER**

15 IT IS SO FOUND AND ORDERED this 9<sup>th</sup> day of December, 2024.

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18 Troy L. Nunley  
19 Chief United States District Judge